

**From:** Emily Schilling  
**To:** [Wilwerding, Joseph](#)  
**Cc:** [Hammond, Lauren](#); [Kelly Johnson](#); [Marie Durrant](#)  
**Subject:** Clarification Requests Regarding Solvay's Pending Section 114(a) Response and Production  
**Date:** Wednesday, April 27, 2016 10:02:41 AM  
**Attachments:** [image001.gif](#)

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Joe,

I am working with Kelly Johnson to pull together Solvay's final document production and response to EPA's follow-up Section 114(a) information request, dated January 25, 2016, which we expect to be very voluminous. As we work through these documents, a couple of questions have arisen for which we would appreciate additional clarification. If a follow-up teleconference is appropriate to discuss further these requests, please let us know as soon as possible.

(1) With respect to Request 7 of the original 2014 Request, EPA asks for "copies of all emission calculations performed in conjunction with the project, a description of each calculation methodology, and all documents discussing the need for permits or applicability for each project." If broadly interpreted, the first clause of this request would encompass all of the emission calculations associated with the BACT analysis (outside of the permit applications themselves, which Solvay is producing pursuant to 2014 Request 6), and the air quality impact analysis, for those projects that Solvay determined *did* need to go through the PSD process. These are voluminous documents that do not speak to the threshold determination of whether the project triggered PSD in the first place. Because the focus on the Request is whether projects triggered PSD, and not the detailed analyses associated with those projects that went through PSD, we are seeking confirmation that detailed calculations, modeling files, etc. associated with the PSD permitting process need not be produced.

(2) With respect to 2016 Request #6 (backup reports for VOC/HAP testing at calciners), do you want the entire backup report or just the summary pages? EPA previously clarified that only the summary pages were required for Solvay's response to 2016 Request #7 (other air pollutant testing on the calciners) and not the full reports. We can provide the backup report or just the summary pages in response to 2016 Request #6 but, given the size of the backup reports and the thousands of pages Solvay will be producing next week, we wanted to verify exactly what information EPA needed with respect to the VOC/HAP testing reports.

Thanks very much,

Emily

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